SAMSUNG

September 12, 2016

Ann Bailey
Director, ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington D.C. 20004

Sent by e-mail to MostEfficient@energystar.gov

Re: EPA's ENERGY STAR Most Efficient 2017 Criteria

Dear Ms. Bailey:

Samsung Electronics ("Samsung") respectfully submits these comments on the EPA's ENERGY STAR Most Efficient 2017 Criteria.

Samsung is a world leader in technology and is one of the fastest growing home appliance brands in the United States. Committed to providing energy efficient home appliances to U.S. consumers, Samsung is the winner of the ENERGY STAR Partner of the Year Award for Sustained Excellence in 2013, 2014, 2015 and 2016.

Samsung strongly supports the ENERGY STAR Most Efficient ("Most Efficient") program. This program enables consumers to find the true top performers with respect to efficiency. Samsung supports EPA's efforts to provide incentives to consumers, manufacturers, retailers on these products. We also support EPA's efforts to differentiate the most efficient products by requiring some additional relevant metrics beyond those required by DOE for federal minimum energy efficiency.

Samsung welcomes EPA's addition of clothes dryers for Most Efficient designation in 2017. Accordingly, we would like to offer the following suggestions to enhance the identification of the most efficient products within this category:

1. 1. Minimum Functionality Testing: EPA's Most Efficient 2017 criteria for clothes dryers propose minimum efficiency levels for both the "Normal Cycle" and the "Most Energy Consuming Cycle." While we acknowledge that the requirement for the Most Energy Consuming Cycle helps to screen out products that may achieve energy efficiency through compromises in performance in Normal Cycle operation, we would like to propose a different approach to address this issue instead of requiring testing of the Most Energy Consuming Cycle. It is very likely that consumers will most often use the Normal Cycle unless the products perform below their expectations, which would likely trigger them to change to a different cycle. Therefore, Samsung proposes that EPA

consider adding minimum acceptable functionality performance metrics to the Normal Cycle testing in order to ensure that consumer performance expectations are met in the Normal Cycle, which would prevent the aforementioned trigger in consumer behavior/

2. Samsung proposes that EPA consider adding a small load size to the test procedure, which would represent user behavior more closely when assessing top -performing products. A NEEA field study (Nov 19, 2014) indicates that small loads (3 ~5lb) are used almost as frequently as the medium loads (6~8) and also that the measured Dryer CEF/EF is lower at small loads, which is not covered in the DOE test procedure today.

3. Samsung suggests that EPA reconsider proposed levels for clothes dryers since it appears that only heat pump dryers can qualify for the Most Efficient designation. Heat pump dryers do not represent the mainstream dryer market in the U.S. Therefore, Samsung suggests that the EPA reconsider the proposed levels to reflect the mainstream drying technology in the U.S.

Samsung looks forward to working with the EPA and stands ready to supply any information the EPA needs as it continues to enhance the Most Efficient program criteria.

Respectfully submitted,

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